

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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PACIFIC GULF SHIPPING CO. AND	:	
MICHAEL ELSE & COMPANY LTD.	:	CIVIL ACTION NO. H-19-CV-727
IN ITS OWN RIGHT AND AS	:	
SUBROGEE OF PACIFIC GULF	:	
SHIPPING CO.,	:	
Plaintiff,	:	
	:	
v.	:	IN ADMIRALTY
	:	
ADAMASTOS SHIPPING & TRADING	:	
S.A., VIGOROUS SHIPPING & TRADING	:	
S.A., FEARLESS SHIPPING & TRADING	:	
S.A., BLUE WALL SHIPPING LTD.,	:	
PHOENIX SHIPPING & TRADING S.A.,	:	
THALASSA HOLDINGS S.A.,	:	
ALASTOR MARINE S.A., GEORGE	:	
GOURDOMICHALIS, and EFSTATHIOS	:	
GOURDOMICHALIS,	:	
	:	
Defendants.	:	
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PLAINTIFFS' RESPONSE IN OPPOSITION TO MOTION TO DISMISS

COME NOW, Plaintiffs Pacific Gulf Shipping Co. and Michael Else & Company Ltd. in its Own right and as subrogee of Plaintiff Pacific Gulf Shipping Co. ("Plaintiffs"), by and through undersigned counsel and files this response in opposition to Defendants' Motion to Dismiss the Second Amended Complaint filed on October 29, 2019 (DE 80).

Plaintiffs respectfully oppose the Motion to Dismiss for the reasons outlined in the Response in Opposition to Motion to Dismiss (DE 69).

Respectfully submitted,

Dated: November 11, 2019
Houston, Texas

CHALOS & CO, P.C.

By: /s/ Briton P. Sparkman
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was served upon all counsel of record pursuant to the Court's CM/ECF system and Rule 5 of the Federal Rules of Civil Procedure on this 11th day of November, 2019.

/s/ Briton P. Sparkman
Briton P. Sparkman